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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

CLASS ACTION

PEREZ-FARIAS, et. al.,

Plaintiffs,

vs.

GLOBAL HORIZONS, INC., et. al.,

Defendants.

No. 05 CV 3061 RHW

MEMORANDUM IN SUPPORT OF
MOTION TO EXPEDITE HEARING

I. ARGUMENT

1 On January 26, 2009, this Court held a status conference and directed
 2 counsel to file any pre-trial motions necessary. Plaintiffs have prepared a pre-trial
 3 motion and memorandum in support to resolve evidentiary issues and to quash trial
 4 subpoenas issued by Global Defendants. This motion may not be scheduled in
 5 time to be heard prior to trial on the regular motion calendar and request that the
 6 Court grant a hearing on this matter on the morning of trial, Monday, February 9,
 7 2009 pursuant to LR 7.1(h)(6).

9 Immediately following the hearing, counsel for Plaintiffs requested counsel
 10 for Defendants respond today and provide counsel for Plaintiffs with their
 11 available dates for the next two weeks so this hearing could be scheduled prior to
 12 trial. *Isley Decl.* ¶ 2. Only counsel for Grower Defendants, Brendan Monahan,
 13 provided available dates. *Id.* ¶ 3. Accordingly, because Plaintiffs did not want to
 14 delay filing this motion, and have no other available dates from Defendants,
 15 Plaintiffs have requested that this matter be heard on the morning of trial since all
 16 counsel will be available at that time.

18 DATED this 26th day of January, 2009.

20 COLUMBIA LEGAL SERVICES

PAINE HAMBLÉN LLP

21 s/ Lori Jordan Isley
 22 Lori Jordan Isley, WSBA #21724
 Attorneys for Plaintiffs

s/ Richard W. Kuhling
 Richard W. Kuhling, WSBA #7927
 Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on this 26th day of January, 2009, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

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s/Lori Jordan Isley
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